IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Criminal No. 01-520 (CCC)

v.

NOLGIE RODRIGUEZ-ZAMO,

Defendant.

Motion to Restrict

TO THE HONORABLE COURT

COMES NOW the defendant, Nolgie Rodriguez-Zamo, represented by the Federal Public Defender for the District of Puerto Rico through the undersigned attorney, and very respectfully states, alleges and prays as follows:

- 1. Mr. Rodriguez-Zamo nconcomitantly with the present motion a Motion for Compassionate Release.
- 2. In order to maintain the privacy of the information contained in the motion, Mr. Rodriguez-Zamo requests leave to file using the *selected* parties viewing restriction. He requests only case participants and this Court have access to the document.
- 3. The motion is being submitted *selected parties* because it contains information related to Mr. Rodriguez-Zamo and his family's medical prognosis that should remain private.

4. Further, the interest in restricting the Motion for Compassionate Release outweighs the presumption of public access.

5. If the Court has any doubts as to the propriety of the foregoing request

or that it remain selected parties, Mr. Rodriguez-Zamo moves for an ex-

parte hearing before the court makes a ruling.

This motion to restrict is filed in compliance with Standing Order No. 9, 6.

issued by the Honorable Aida M. Delgado-Colon in Misc. No. 03-419.

WHEREFORE, it is respectfully requested that the Court take notice of the

present motion and that the same be granted.

I HEREBY CERTIFY that on this date I electronically filed the present

motion with the Clerk of Court using the CM/ECF system which will send electronic

notification of said filing to all parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this February 8th, 2022.

ERIC ALEXANDER VOS

Chief Defender

District of Puerto Rico

S/Isabel A. Mattina-Leal

Isabel A. Mattina-Leal

Assistant Federal Public Defender

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